## STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

| Norfolk Southern Railway Company, the City of Momence, and the State of Illinois, Department of | ) |          |
|---|---|----------|
| Transportation.   | ) |          |
|   | ) | T15-0044 |
| Stipulated Agreement regarding improving public   | ) |          |
| safety at the Ash Street and Market Street highway-rail   | ) |          |
| grade crossings of the Norfolk Southern Railway's   | ) |          |
| track in Momence, Kankakee County, Illinois,  | ) |          |
| designated as crossings AAR/DOT #534 359E,  | ) |          |
| railroad milepost KS-89.77 and AAR/DOT #534 364B,   | ) |          |
| railroad milepost KS-90.32, respectively.   | ) |          |

## NORFOLK SOUTHERN RAILWAY COMPANY'S REQUEST FOR EXTENSION OF TIME

In support of its Request for Extension of Time, Norfolk Southern Railway Company (hereinafter "Norfolk Southern") states as follows:

- On May 6, 2015, the Commission entered its Order in this docket directing the parties to complete certain improvements at the Ash Street and Market Street highway-rail grade crossings of the Norfolk Southern Railway Company's track in Momence, Illinois, designated as crossings AAR/DOT #534 359E, railroad milepost KS-89.77 and AAR/DOT #534 364B, railroad milepost KS-90.32, respectively.
- 2. The Commission directed that all ordered improvements be completed by Norfolk Southern and the City of Momence within twelve (12) months of the Commission's Order (i.e., by May 6, 2016).
- At both the Ash Street and Market Street highway-rail grade crossings (AAR/DOT #534 359E, railroad milepost KS-89.77 and AAR/DOT #534 364B, railroad milepost KS-90.32, respectively), Norfolk Southern timely installed temporary STOP signs as ordered by Commission in this docket.
- 4. Norfolk Southern has also been ordered to install automatic flashing light signals and gates with a bell, controlled by constant warning circuitry, and equipped with an event recorder

and capable of remote monitoring system when available at the Ash Street and Market

Street crossings. In order to complete the installation of said work, an electric power supply

is needed at both crossings, and as such, requires coordinated scheduling with

Commonwealth Edison ("ComEd"), the utility in this docket.

5. However, the work to install automatic flashing light signals and gates on this project was

delayed in part to some design modifications requested by the Commission and some

scheduling issues with ComEd, one of three utilities involved in this particular matter.

6. On April 8, 2016, Norfolk Southern notified ICC Staff Aaron Toliver in writing that work had

commenced at the Ash Street and Market Street crossings to install the automatic flashing

light signals and gates.

7. While the remaining work ordered by the Commission in this docket is underway, the

aforementioned delays may prevent Norfolk Southern from completing the ordered work by

May 6, 2016.

8. Accordingly, Norfolk Southern timely requests that it be granted an extension of time to

complete the work previously ordered by the Commission in this docket.

WHEREFORE, Norfolk Southern respectfully requests that Norfolk Southern be granted an

extension of time - until November 6, 2016 - to complete its work as previously ordered by the

Commission in this docket.

Respectfully submitted,

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One of the Attorneys for Respondent

Norfolk Southern Railway Company

**Dated: April 14, 2016** Neil F. Flynn & Associates Attorneys at Law

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